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Burns et al – GAU 2178 (Tsui)
Supplemental Amendment to Submission in Support of RCE

REMARKS

Claims 1, 18 and 24-46 have been amended herein. The present amendments include, and supplement, the amendments previously made in the Submission in Support of RCE filed on October 2, 2007. No claims have been canceled or added. Hence, Claims 1-46 are pending in the application.

I.   SUMMARY OF INTERVIEW

The Examiner is thanked for granting the courtesy of a telephone interview on October 24, 2007. Examiner Tsui and Applicants' representatives Brian D. Hickman and Stoycho D. Draganoff attended the interview. Claims 1 and 18 were discussed. The references discussed were Abrams et al., U.S. Patent No. 6,675,350 ("ABRAMS") and Hofmann et al., U.S. Patent Application Publication No. US 2001/0009016 ("HOFMANN"). An agreement regarding patentability was not reached.

First, the Applicants' representatives pointed out that the feature of generating and storing a mapping in Claims 1 and 18 clearly distinguishes these claims from ABRAMS and HOFMANN. Specifically, the Applicants' representatives pointed out that neither ABRAMS nor HOFMANN describe generating and storing a mapping that maps one or more page parameters to one or more portlet parameters, as featured in Claim 1. (An example of such mapping according to one embodiment is illustrated in FIG. 1, reference numeral 141, of the present application.) Further, the Applicants' representatives pointed out that the first mapping featured in Claim 18 is a mapping that maps one or more events to one or more actions and one or more event output parameters to one or more page parameters (an example of such mapping according to one embodiment is illustrated in FIG. 1, reference numeral 142, of the present

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application); in contrast, the Applicants' representatives pointed out that neither ABRAMS nor HOFMANN describe or suggest such a mapping.

Next, the Applicants' representatives pointed out that both Claim 1 and 18 comprise the feature of wherein the portlet is executable code that is operable to generate page components. Thus, this feature of Claims 1 and 18 clearly indicate that a portlet is executable code and not window panes or tabs GUI objects.

Finally, the Examiner explained that he considered the action of a user pressing a button to submit a URL to the HTML parser of ABRAMS as an "event." The Applicants' representatives pointed out that Claim 18 comprises the feature of a portlet, which previously generated a page component, generating a particular event in response to a user manipulating the page component. Since Claim 18 also includes the feature of wherein the portlet is executable code that is operable to generate page components, the Applicants' representatives pointed out that the action of a user clicking on a button of a GUI object as described in ABRAMS is not the same as or equivalent to a portlet generating an event in response to a user manipulating a page component, as featured in Claim 18.

At the end of the interview, the Examiner indicated that as amended Claims 1 and 18 seem to overcome at least ABRAMS. The Examiner indicated that he would reconsider Claims 1 and 18 once the amendments discussed during the interview are officially submitted.

It is respectfully submitted that Claims 1 and 18 are amended herein as discussed during the Telephone Interview of October 24, 2007. In light of the discussion during the Telephone Interview, reconsideration of Claims 1 and 18 is respectfully requested.

Further, for the Examiner's convenience, the arguments presented in the Submission in Support of RCE filed on October 2, 2007 are reproduced hereinafter.

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II.   REJECTION OF CLAIM 18 UNDER 35 U.S.C. § 112

The final Office Action rejected Claim 18 as allegedly indefinite under 35 U.S.C. §112, second paragraph. In response, the Applicants amended Claim 18 to recite:

> in response to a user manipulating a component associated with a page, a portlet
>   that <u>previously generated</u> the component generating a particular event;

The Advisory Action declined to enter this amendment, contending that this amendment changed the scope of Claim 18 and thus required a new search and consideration.

The present communication re-introduces the above amendment to Claim 18. Since the Advisory Action insisted that this amendment to Claim 18 required a new search, it is respectfully submitted that Claim 18 overcomes the rejection under 35 U.S.C. § 112, second paragraph.

Finally, it seems that the Advisory Action has misconstrued the arguments presented by the Applicants in the response to the final Office Action with respect to the above amendment to Claim 18. Specifically, the Advisory Action asserts that by stating that the above amendment made Claim 18 more clear, the Applicants have implicitly admitted that the claim was indefinite and thus the rejection of this claim under 35 U.S.C. § 112, second paragraph was proper. This assertion by the Advisory Action is not correct and the Applicants have NOT made any implicit admissions.

The Applicants previous arguments merely pointed out that as it previously existed Claim 18 already included clear language indicating that the portlet generating the particular event is the <u>same</u> portlet that generated the component. Thus, the above amendment to Claim 18 was merely an amendment of form that did not affect the scope of the claim.

For the above reasons, reconsideration and withdrawal of the rejection of Claim 18 under 35 U.S.C § 112, second paragraph is respectfully requested.

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III.   ISSUES RELATED TO THE CITED ART

    A.   INDEPENDENT CLAIM 1

    The final Office Action rejected Claim 1 as allegedly unpatentable under 35 U.S.C. §

103(a) over Abrams et al., U.S. Patent No. 6,675,350 ("ABRAMS") in view of Hofmann et al.,

U.S. Patent Application Publication No. US 2001/0009016 ("HOFMANN"). The Advisory

Action maintained this rejection. The rejection is respectfully traversed.

    Citing an entry from Wikipedia.com, the Advisory Action asserts that portlets and display

areas/window panes are the same thing. This assertion is incorrect.

    First, the entry cited from Wikipedia.com is not dated and thus cannot be used in a

rejection against the claims of the present application.

    Second, even if, based on the cited Wikipedia.com entry, the term "portlet" may be

reasonably considered to be as broad as the Advisory Action asserts (which it cannot be!), the

term "portlet" as used in Claim 1 cannot be considered to be a display area or a window pane.

For example, Claim 1 includes the feature of:

        … a portlet that generates a component of the page … .

This feature of Claim 1 indicates that a portlet is a thing that <u>generates</u> a component of a web

page. Claim 1 also includes the feature of:

        inserting the component that was generated by the portlet into the page.

This feature of Claim 1 expressly indicates that the generated component, <u>and not the portlet</u>

<u>itself</u>, is the thing that is inserted into a page. Thus, the portlet of Claim 1 cannot be considered

to be a display area or a window pane.

    Further, the tabbed display area illustrated in Fig. 6 by reference numeral 630 and

described in col. 6, lines 1-5 of ABRAMS does **not** generate anything. Rather, the tabbed display

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area in Fig. 6 of ABRAMS seem to be a portion of the GUI of a standalone HTML parser

program.

For the above reasons, the GUI display area and any window panes described in

ABRAMS are not equivalent to the portlet of Claim 1.

The Advisory Action asserts that the feature of Claim 1 of:

> inspecting a mapping to determine that the page parameter is mapped to a portlet
> parameter of a portlet that generates a component of the page that is based, at least
> in part, on the portlet parameter;

does not require that the mapping between portlet parameters and page parameters to be "pre-

existing/pre-defined". This assertion is incorrect.

The above feature of Claim 1 clearly requires the step of <u>inspecting a mapping...</u>. Since

it is quite clear that something that does not exist cannot be inspected, Claim 1 necessarily

features a mapping that is in existence or, in the parlance of the Advisory Action, is "pre-

existing/pre-defined." For this reason, by arguing that ABRAMS and HOFMANN do not

describe this feature of Claim 1, the Applicants have not argued a feature that is not in the claim.

Further, for the reasons presented in the response to the final Office Action, the Applicants

respectfully submit that ABRAMS and HOFMANN do not describe or suggest this feature of

Claim 1.

For the foregoing reasons, ABRAMS and HOFMANN do not describe or suggest all

features of Claim 1. Thus, Claim 1 is patentable under 35 U.S.C. § 103(a) over ABRAMS in

view of HOFMANN. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully

requested.

B.   INDEPENDENT CLAIM 18

Claim 18 was apparently rejected under 35 U.S.C. § 103(a) as allegedly anticipated by

ABRAMS in view of HOFMANN, even though the final Office Action did not provide any

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citations to HOFMANN in the rejection. The rejection is respectfully traversed.

First, as discussed above, the Advisory Action stated that the present amendment to Claim 18 requires a new search and consideration. For this reason, it is respectfully submitted that Claim 18 overcomes the rejection under 35 U.S.C. § 103(a) over ABRAMS in view of HOFMANN.

Second, the Advisory Action asserts that ABRAMS describes a "URL selection event" in col. 4, lines 1-21 and col. 6, lines 25-32. This assertion is incorrect. The entire description of ABRAMS does **not** include even a single recitation of the term "event". Thus, ABRAMS cannot possibly describe that an "event" is being generated when a URL is somehow selected.

In contrast, Claim 18 features of <u>a portlet generating a particular event</u> in response to a user manipulating a component associated with a page. Claim 18 also features a mapping that maps portlet-generated events to actions <u>and</u> also maps event output parameters to page parameters. Claim 18 also comprises the feature of inspecting the first mapping to determine that an event output parameter associated with a particular event is mapped to a page parameter. For the above reasons, and also for the reasons presented in the response to the final Office Action, the Applicants respectfully submit that ABRAMS and HOFMANN do not describe or suggest these features of Claim 18.

For the foregoing reasons, ABRAMS and HOFMANN do not describe or suggest all features of Claim 18. Thus, the Claim 18 is patentable under 35 U.S.C. § 103(a) over ABRAMS in view of HOFMANN. Reconsideration and withdrawal of the rejection of Claim 18 is respectfully requested.

C.   DEPENDENT CLAIMS 2-17 AND 19-46

Claims 2-3, 5, 7-8, 13-14, 16-17, 19-26, 28, 30-31, 36-37, and 39-46 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over ABRAMS in view of HOFMANN.

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Claims 4, 6, 27, and 29 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over

ABRAMS in view of HOFMANN and further in view of Hind et al., U.S. Patent Application

Publication No. US 2004/0205555 ("HIND"). Claims 9-12 and 32-35 were rejected as allegedly

unpatentable under 35 U.S.C. § 103(a) over ABRAMS in view of HOFMANN further in view of

HIND and further in view of Burnard et al., U.S. Patent No. 5,613,122 ("BURNARD"). Claims

15 and 38 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over ABRAMS in

view of HOFMANN and further in view of Katariya et al., U.S. Patent No. 6,564,251

("KATARIYA").

Each of Claims 2-3, 5, 7-8, 13-14, 16-17, 19-26, 28, 30-31, 36-37, and 39-46 depends

directly or indirectly from one of independent Claims 1 and 18, and thus includes each and every

feature of the independent base claim. Furthermore, in rejecting Claims 4, 6, 9-12, 15, 27, 29,

32-35, and 38 the Office Action relies explicitly on ABRAMS and HOFMANN, and not on

HIND, BURNARD or KATARIYA, to show the features discussed above with respect to Claims

1 and 18. Because ABRAMS does not teach the subject matter of Claims 1 and 18, any

combination of ABRAMS and HOFMANN with the other three references necessarily fails to

teach the complete combination recited in any dependent claim of Claims 1 or 18. Thus, each of

Claims 2-3, 5, 7-8, 13-14, 16-17, 19-26, 28, 30-31, 36-37, and 39-46 is allowable for the reasons

given above for Claims 1 and 18.

In addition, each of Claims 2-3, 5, 7-8, 13-14, 16-17, 19-26, 28, 30-31, 36-37, and 39-46

introduces one or more additional features that independently render it patentable. However, due

to the fundamental differences already identified, to expedite the positive resolution of this case a

separate discussion of those features is not included at this time. Therefore, it is respectfully

submitted that Claims 2-3, 5, 7-8, 13-14, 16-17, 19-26, 28, 30-31, 36-37, and 39-46 are allowable

for the reasons given above with respect to Claims 1 and 18. Reconsideration and withdrawal of

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the rejections of Claims 2-3, 5, 7-8, 13-14, 16-17, 19-26, 28, 30-31, 36-37, and 39-46 is

respectfully requested.

IV.   CONCLUSION

The Applicants believe that all issues raised in the Office Action have been addressed.

Further, for the reasons set forth above, the Applicants respectfully submit that allowance of the

pending claims is appropriate. Entry of the RCE filed concurrently herewith, and

reconsideration of the present application are respectfully requested in light of the amendments

and remarks herein.

The Examiner is respectfully requested to contact the undersigned by telephone if it is

believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is

hereby made. If applicable, a law firms check for the petition for extension of time fee is

enclosed herewith.

If any applicable fee is missing or insufficient, throughout the pendency of this

application, the Commissioner is hereby authorized to charge any applicable fees and to credit

any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

Dated: October 29, 2007   /StoychoDDraganoff#56181/
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